Commonwealth of Massachusetts Department of Telecommunications and Energy Fitchburg Gas and Electric Light Company Docket Nos. D.T.E. 02-25

Attorney General's Second Set of Document and Information Requests

Request No. AG 2-4:

To the extent that workpapers and other supporting materials were produced using spreadsheet software, please provide electronic versions of these materials (working models with all related and referenced spreadsheet models and data) related to Mr. Harrison's marginal cost of service study (electric) in Excel or Lotus 123 format. The electronic versions must contain all formulae and permit the recalculation of Mr. Harrison's results. Describe of how each model/spreadsheet was constructed and operates (identify key variables, inputs and outputs).

Response:

In the course of performing the marginal cost study, the Company provided numerous files in Excel or Lotus format which were used in whole or part. All of this information is enclosed on a compact diskette. The included spreadsheets are self documenting including rudimentary calculations and considerable data input all of which are self evident. In order to gather adequate information to perform the marginal cost study, MAC distributed four data requests and received numerous responses from the Company. In some instances the Company provided partial information and then provided multiple submissions. Often electric and gas information was intermingled and provided at the same time, similarly accounting and marginal information was sent intermingled. MAC considered all of this information in the conduct of its study. To be certain that no information has been inadvertently omitted, the attached CD contains all of the electronic files used in the conduct marginal cost study, except for proprietary spreadsheet models that are provided in response to other questions.

Person Responsible: James L. Harrison